

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION

MDL No. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

**STATEMENT OF OBJECTION OF LACEY DONLON
TO AMENDED SETTLEMENT AGREEMENT
AND NOTICE OF INTENTION TO APPEAR AT FAIRNESS HEARING**

Lacey Donlon (“Ms. Donlon”), by her undersigned counsel, pursuant to Fed. R. Civ. P. 23(e) and the Court’s Preliminary Approval Order (ECF No. 278), as amended by the Court’s August 1, 2017 Minute Entry (ECF No. 432), objects to the Second Amended Class Action Settlement Agreement and Release dated May 20, 2016 (“Amended Settlement”) as not fair, reasonable or adequate as applied to Women Lacrosse Players for the reasons set forth more fully in the Statement of Objection of Samantha Greiber, On Behalf of a Putative Subclass of Women Lacrosse Players, To Amended Settlement Agreement (ECF No. 450) (“Greiber Objection”), which Ms. Donlon adopts and incorporates herein. The undersigned counsel respectfully request that Ms. Donlon’s Objection be consolidated and heard with the Greiber Objection. Pursuant to the Court’s Preliminary Approval Order (ECF No. 278), ¶ 32, as amended by the Court’s August 1, 2017 Minute Entry (ECF No. 432), Ms. Donlon provides the following additional information and notice:

1. Ms. Donlon was a student at St. Joseph’s College in Patchogue, New York, where she played NCAA women’s lacrosse (Division III) in intercollegiate fall play in 2013. This was an NCAA-sanctioned sport as, among other things, the NCAA Women’s Lacrosse Rules

Committee issued a September 19, 2013 Memorandum to Head Women's Lacrosse Coaches and Officials governing "2013 Fall Ball." *See* Exhibit 1 hereto. As such, Ms. Donlon is a member of the Settlement Class and the Contact Sports Subclass.

2. Ms. Donlon has sustained concussions playing lacrosse and desired to wear a helmet when she played at St. Joseph's College, but the NCAA Women's Lacrosse Rules made the use of such helmets illegal at that time that she played. Ms. Donlon believes that women lacrosse players should wear protective helmets, but the NCAA still does not require such helmets for women, nor does it sufficiently educate student-athletes about protective helmets and the health and safety benefits that they provide.

3. Ms. Donlon intends to make an appearance at the Fairness Hearing for the purpose of objecting to the proposed Amended Settlement on the grounds set forth in the Greiber Objection, as adopted herein.

3. The undersigned counsel intend to make an appearance at the Fairness Hearing for the purpose of objecting, on behalf of Ms. Donlon, as well as Ms. Greiber and a putative class of Women Lacrosse Players, to the proposed Amended Settlement on the grounds set forth in the Greiber Objection.

Respectfully submitted,

Dated: September 15, 2017

/s/ Aron U. Raskas

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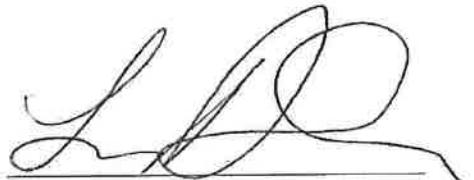
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Counsel for Objector Lacey Donlon

CERTIFICATION AND SIGNATURES OF OBJECTOR

I, Lacey Donlon, hereby adopt and submit the forgoing Statement of Objection (incorporating the Greiber Objection) as my Objection pursuant to the Preliminary Approval Order.

September 13, 2017



Lacey Donlon
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CERTIFICATE OF SERVICE

I hereby certify that, on this 15th day of September, 2017, a true and correct copy of the foregoing document was filed electronically on the Court's CM/ECF system, which caused notice to be sent to all counsel of record.

/s/ Aron U. Raskas